April 11, 2023

Daniel Pronio, President

Northeast Iron Works Inc.

2632 Douglas Street NE

Washington, DC 20018

**Subject: Permit No. 6964-R1 to Operate a Paint Spray Booth at 2632 Douglas Street NE**

Dear Mr. Pronio:

Pursuant to sections 200.1 and 200.2 of Title 20 of the District of Columbia Municipal Regulations (20 DCMR), a permit from the Department of Energy and Environment (“The Department”) shall be obtained before any person may construct or operate a stationary source in the District of Columbia. The renewal application of Northeast Iron Works, Inc. (“the Permittee”) to operate an Amerex Model IS45+IS18 paint spray booth at their facility has been received. Permission to operate this dry filter-style paint spray booth located at the back of the warehouse at 2632 Douglas Street NE, Washington DC, per the submitted application, received October 19, 2021, is granted subject to the following conditions:

I. General Requirements:

a. The paint booth shall be maintained and operated in accordance with the air pollution control requirements of 20 DCMR.

b. This permit expires on April 10, 2028 [20 DCMR 200.4]. If continued operation after this date is desired, the Permittee shall submit an application for renewal by January 10, 2028.

c. Operation of equipment under the authority of this permit shall be considered acceptance of its terms and conditions.

d. The Permittee shall allow authorized officials of the District, upon presentation of identification, to:

1. Enter upon the Permittee’s premises where a source or emission unit is located, an emissions related activity is conducted, or where records required by this permit are kept;

2. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of this permit;

3. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and

4. Sample or monitor, at reasonable times, any substance or parameter for the purpose of assuring compliance with this permit or any applicable requirement.

e. This permit shall be kept on the premises and produced upon request.

f. Failure to comply with the provisions of this permit may be grounds for suspension or revocation. [20 DCMR 202.2]

II. Emission Limits:

a. No person shall discharge into the atmosphere more than fifteen (15) pounds of volatile organic compound (VOC) emissions in any one (1) day, nor more than three pounds (3 lb.) in any one (1) hour, from any combination of articles, machines, units, equipment, or other contrivances at a facility, unless the uncontrolled VOC emissions are reduced by at least ninety percent (90%) overall capture and control efficiency. [20 DCMR 700.2]

b. An emission into the atmosphere of odorous or other air pollutants from any source in any quantity and of any characteristic, and duration which is, or is likely to be injurious to the public health or welfare, or which interferes with the reasonable enjoyment of life or property is prohibited [20 DCMR 903.1]

c. Visible emissions shall not be emitted into the outdoor atmosphere from the paint spray booth. [20 DCMR 107 and 606]

d. The Permittee shall not discharge into the atmosphere more than forty pounds (40 lb.) of non-photochemically reactive solvents in any one (1) day, nor more than eight pounds (8 lb.) in any one (1) hour, from any article, machine, equipment, or other contrivance, unless the uncontrolled organic emissions are reduced by at least eighty-five percent (85%). [20 DCMR 708.2]

e. Emissions of VOCs from the use of any cleaning solvent, except those listed in Conditions II(e)(1) through (5) below (which are included in the accounting for compliance with Condition II(a)) shall be maintained below fifteen (15) pounds in any one (1) day from all such sources at the facility. [20 DCMR 201 and 20 DCMR 770.1]

1. Emissions from cleaning and surface preparation operations subject to Condition III(b);
2. Emissions from products used to strip cured inks, coatings, and adhesives;
3. Emissions from cleaning products used for janitorial purposes, including graffiti remover products;
4. Emissions from products used to clean resin, coating, ink, and adhesive mixing, molding, and application equipment; and
5. Emissions from cleaning and surface preparation operations related to application of coatings subject to regulation under 20 DCMR 773 to 778 (AIM) to the extent the coatings are used as architectural and industrial maintenance coatings.

III. Operational Limits and Standards:

a. No chemical stripping shall occur at the facility. [20 DCMR 201]

b. Adhesives, sealants, adhesive primers, or sealant primers shall not be used in the equipment unless they meet the following requirements:

1. They are contact adhesives sold or supplied by the manufacturer in containers containing a net volume of one gallon or less;

2. They are plastic cement welding adhesives (any adhesive intended by the manufacturer for use to dissolve the surface of plastic to form a bond between mating surfaces) with volatile organic compound (VOC) content not exceeding 400 g/L for ABS welding, 490 g/L for CPVC welding, 510 g/L for PVC welding, or 510 g/L for other plastic cement welding;

3. They are other adhesives, sealants, adhesive primers, or sealant primers sold or supplied by the manufacturer or supplier in containers with a net volume of sixteen (16) fluid ounces or less, or a net weight of one pound or less; or

4. The adhesive, sealant, adhesive primer, or sealant primer has received written approval from the Department for use in the equipment and complies with the requirements of 20 DCMR 743-749, as applicable.

c. Mobile equipment, as defined in 20 DCMR 799, shall not be coated in this paint booth. [20 DCMR 201]

d. The exhaust stack shall have a minimum height of 20 feet above grade (ground level) and shall be designed in such a way as to ensure compliance with Condition II(b). [20 DCMR 201]

e. The coatings applied shall be by one or more of the following methods:

1. Powder coating;

2. Hand-held, non-refillable aerosol containers;

3. Non-atomizing application technology (paint brushes, rollers, hand wiping, flow coating, dip coating, touch-up markers, or marking pens);

4. Other non-atomizing application technology approved by the Department to not be covered by 40 CFR 63, Subpart HHHHHH or another regulation not addressed in this permit; or

5. High volume low pressure (HVLP) spray guns.

f. Whenever spray guns are used:

1. The coatings used shall not contain any compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd) [20 DCMR 201]; and

2. Cleaning of spray guns shall be performed by one or a combination of the following methods [20 DCMR 201]:

i. Use of an enclosed spray gun cleaning system that is kept closed when not in use;

ii. Use of an unatomized discharge of solvent into a paint waste container that is kept closed when not in use;

iii. Disassembly of the spray gun and cleaning in a vat that is kept closed when not in use; or

iv. Use of an atomized spray into a paint waste container that is fitted with a device designed to capture atomized solvent emissions.

g. The paint spray booth shall meet the following specifications [20 DCMR 201]:

1. The unit shall be fitted with a high capacity activated carbon filter technology with at least a MERV 8 rating that shall be in use during all painting operations occurring in the paint spray booth.

2. The exhaust filters shall be replaced as specified by manufacturers’ specifications and sufficiently frequently to ensure compliance with Condition II(b) of this permit.

3. The unit shall be constructed with a full roof and must be ventilated at negative pressure so that air is drawn into the front opening any openings in the booth walls.

4. The unit shall be maintained and operated at all times in accordance with manufacturer’s recommendations. If no manufacturer’s recommendations are available, the Permittee shall maintain a record of standard industry recommendations for similar paint booths and shall maintain the booth in accordance with those recommendations.

h. The Permittee shall comply with the following housekeeping and pollution prevention measures [20 DCMR 201 and 20 DCMR 771.3]:

1. Perform all painting operations that utilize a spray gun in the paint spray booth;

2. Store all VOC containing materials, coatings, solvents, industrial cleaning solvents, inks, adhesives, and waste materials in closed containers, except when depositing or removing these materials;

3. Minimize spills of VOC containing materials;

4. Clean up spills immediately;

5. Convey any VOC containing materials, coatings, solvents, industrial cleaning solvents, inks, adhesives, and waste materials in closed containers or pipes;

6. Close mixing vessels which contain VOC containing materials, coatings, solvents, industrial cleaning solvents, inks, and adhesives except when they are specifically in use;

7. Minimize emissions of VOCs during cleaning of storage, mixing, conveying, and other equipment; and

8. Store cloth and paper, or other absorbent applicators, moistened with coatings, solvents or cleaning solvents in closed, nonabsorbent, nonleaking containers.

i. At all times, including periods of startup, shutdown, and malfunction, the Permittee shall, to the extent practicable, maintain and operate the spray painting equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. [20 DCMR 201]

j. The Permittee shall not perform metal furniture coating subject to 40 CFR 60, Subpart EE in this paint booth. [20 DCMR 201]

IV. Monitoring and Testing Requirements:

a. The Permittee shall track the quantity and volatile organic compound (VOC) content of all paints and coatings used at the facility, as applied, to ensure compliance with Condition II(a). If applied, unadulterated, as the coating is obtained from the manufacturer, documentation provided by the manufacturer may be used to determine the VOC content.

Whenever such information is not available from the manufacturer or whenever a paint or coating is not applied as obtained from the manufacturer, the following method shall be used to determine the VOC content:

The mass of VOC per combined volume of VOC and coating solids, less water and exempt compounds shall be calculated, in pounds per gallon, by the following equation. To convert from grams per liter to pounds per gallon (lb/gal), multiply the result (VOC content) by 8.345 x 10-3 (lb/gal/g/l):



where:

VOC = VOC content in grams per liter (g/l) of coating less water and non VOC solvents;

Wv = Mass of total volatiles, in grams;

Ww = Mass of water, in grams;

Wec = Mass of exempt compounds, in grams;

V = Volume of coating, in liters;

Vw = Volume of water, in liters; and

Vec = Volume of exempt compounds, in liters; and

b. The Permittee shall maintain an awareness of the area to ensure that the odor and nuisance air pollutant requirements of Condition II(b) are met.

c. The Permittee shall monitor the emission point from the spray booth to ensure that the requirements of Condition II(c) are met.

d. The Permittee shall monitor the material safety data sheets or other paint, coating, adhesive, sealant, adhesive primer, or sealant primer specification sheets to ensure compliance with Conditions III(b) and III(f)(1).

e. The Permittee shall monitor the types of spray booth filters purchased and their replacement dates to ensure that all filters used meet the requirements of Conditions III(g)(1) and (2).

f. The Permittee shall monitor the maintenance and operational status of the spray booth and the activities performed in the spray booth and at the facility to ensure compliance with the requirements of Conditions III(c), (e), (f), (h), (i), and (j).

g. The Permittee shall monitor the identity and total quantity of any non-photochemically reactive solvents, as applied, at the facility to ensure compliance with Condition II(d).

h. The Permittee shall monitor the identity and total quantity of any solvents used at the facility (other than those monitored pursuant to Condition IV(g)) and shall categorize them as being subject to either Condition II(a) or II(e). Such monitoring shall be sufficient to, in combination with the information found from Condition IV(a), ensure compliance with Conditions II(a) and II(e).

V. Record Keeping Requirements:

The Permittee shall maintain the following records for not less than three years from the date of each record. [20 DCMR 500.8]

a. The Permittee shall maintain records of the quantity, type, and VOC content of all paints, coatings, and solvents used at the facility, as applied. The quantities of each coating shall be updated daily, and summed monthly;

b. The Permittee shall maintain records of all cleaning solvents used and categorize them as subject to Condition II(a), II(d), II(e), or III(b). Records shall be maintained in such a way as to allow for the determination and documentation of compliance with those conditions.

c. Based on the monitoring and calculations required under Condition IV(a) and IV(h) and the records kept under Conditions V(a) and V(b), the Permittee shall determine and keep records of the VOCs emitted from this equipment to ensure compliance with Condition II(a);

d. The Permittee shall maintain records of the type(s) and target hazardous air pollutant (HAP) contents of coatings used in any spray guns to document compliance with Condition III(f)(1);

e. The Permittee shall maintain records of the specifications and replacement dates of spray booth filters to document compliance with Condition III(g)(1) and (2);

f. The Permittee shall maintain records of all maintenance performed on the spray booth;

g. The Permittee shall maintain records of any monitoring conducted in accordance with the requirements of Condition IV(g) to document compliance with Condition II(d).

h. The Permittee shall maintain records of any deviations from the requirements of Conditions II and III of this permit.

VI. Reporting Requirements:

a. The Permittee shall immediately contact the Air Quality Division’s Compliance and Enforcement Branch upon becoming aware of a sudden equipment failure or emergency or emissions in excess of any emission limit. The general phone number for the Department is (202) 535-2600.

b. In addition to complying with Condition VI(a) and any other reporting requirements mandated by the District of Columbia, the Permittee shall, within thirty (30) calendar days of becoming aware of any occurrence of excess emissions, supply the Department of the Environment in writing with the following information:

* + 1. The name and location of the facility;
		2. The subject source(s) that failed, experienced the emergency, or caused the excess emissions;
		3. The time and date of the first observation of the equipment failure, emergency, or excess emissions;
		4. The cause and estimate/expected duration of the excess emissions (if applicable); and
		5. The proposed corrective actions and schedule to correct the conditions causing the emergency or excess emissions.

If there are any further questions, please contact me at (202) 535-1747 (stephen.ours@dc.gov) or Olivia Achuko at (202) 535-2997 (olivia.achuko@dc.gov)

Sincerely,

Stephen S. Ours, P.E.

Chief, Permitting Branch

SSO\OA